

IN THE CIRCUIT COURT FOR COCKE COUNTY, TENNESSEE

Domestic Relations Division

Jeremy S. Black

Plaintiff / Counter-Defendant

v.

Teshia Black

Defendant / Counter-Plaintiff

Case No.: 37,107, II

Judge: Hon. James L. Gass

Date March 13, 2024

PLAINTIFF'S MOTION FOR CONTEMPT

(Intentional Dissipation of Marital Business Income)

Plaintiff Jeremy S. Black respectfully moves this Honorable Court to hold Defendant Teshia Black in contempt for violating the Automatic Temporary Injunction issued pursuant to T.C.A. § 36-4-106(d), and in support thereof states as follows:

I. AUTOMATIC INJUNCTION

Upon the filing of a divorce complaint in Tennessee, an Automatic Temporary Injunction is immediately imposed upon both parties.

The injunction prohibits either party from:

- Transferring, concealing, or dissipating marital property
- Interfering with business operations
- Destroying or terminating income-producing marital assets

unless authorized by the Court or agreed to by the parties.

This injunction was in effect during the events described below.

II. THE MARITAL BUSINESS

During the marriage, the parties operated an internet-based appliance advertising and service business that generated income through:

- Website advertising
- Online service leads
- Client payments through Square, Zelle, and other platforms
- Google AdSense advertising revenue

The business operated continuously for approximately ten years and generated substantial income used to support the family.

Business revenue contributed to:

- Mortgage payments
- Household expenses
- Vehicle purchases
- Family living expenses
- Health Insurance expenses
- Life Insurance expenses
- extracurricular school expenses for Children

Plaintiff was responsible for operating and managing the technical aspects of the business.

III. SHUTDOWN OF THE BUSINESS

In or around July 2024, Defendant intentionally canceled or terminated the websites and advertising services associated with the business.

This shutdown occurred:

- Without Plaintiff's consent
- Without court authorization
- While the Automatic Temporary Injunction was in effect
- At approximately the same time Defendant initiated divorce proceedings.

Immediately after the shutdown:

- Business deposits stopped
- Client payments ceased
- Advertising revenue ended

This resulted in the complete termination of the business income stream.

IV. FINANCIAL IMPACT

The business historically generated recurring deposits from sources including:

- Client payments
- Advertising services
- Online payment processors

Financial records show deposits associated with the business prior to July 2024.

After the shutdown of the websites and advertising services, those deposits stopped entirely.

The shutdown therefore caused a significant loss of marital income during the pendency of the divorce.

V. VIOLATION OF THE AUTOMATIC INJUNCTION

Defendant's actions constitute a violation of T.C.A. § 36-4-106(d) because Defendant:

1. Intentionally interfered with an income-producing marital asset.
2. Caused the termination of a marital business revenue stream.
3. Took these actions without court approval.
4. Took these actions while the automatic injunction was in effect.

These actions represent dissipation of marital property and interference with marital business operations.

VI. RELIEF REQUESTED

Plaintiff respectfully requests that this Court:

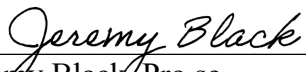
1. Find Defendant in contempt for violating the Automatic Temporary Injunction.
 2. Determine that Defendant intentionally interfered with marital business income.
 3. Consider the loss of business income when dividing marital property.
 4. Grant any further relief the Court deems just and appropriate.
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VII. DISSIPATION OF MARITAL ASSETS

Tennessee courts recognize that a spouse's intentional destruction, concealment, or depletion of marital assets during the pendency of divorce proceedings constitutes dissipation of marital

property. Under Tennessee Code Annotated § 36-4-121(c), courts must consider the dissipation of marital assets when making an equitable division of property. Tennessee appellate courts have held that dissipation occurs when one spouse uses or destroys marital property for a purpose unrelated to the marriage and in anticipation of divorce or litigation. See Altman v. Altman and Larsen-Ball v. Ball. In this case, Defendant's termination of the parties' income-producing websites and advertising services—without court authorization and during the pendency of the automatic injunction—eliminated an ongoing marital income stream and therefore constitutes dissipation of marital assets subject to the Court's review and remedy.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motions was served upon counsel of record by Email on this 13_ day of _March, 2026.

Crystal Jessee (Jessee Law Office):

- Mailing Address:

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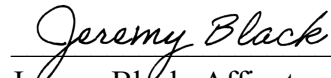
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Respectfully submitted,



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